



August 10, 2023

Casey Sixkiller  
Regional Administrator  
US Environmental Protection Agency  
Region 10  
1200 6<sup>th</sup> Ave, Suite 155  
Seattle WA 98101

Dear Regional Administrator Sixkiller:

On behalf of the Agriculture Transportation Coalition (AgTC) thank you for the opportunity to comment on the US EPA Proposed Plan for the East Waterway Operable Unit remedial action.

The AgTC represents U.S. agriculture exporters nationwide. The Journal of Commerce has cited the AgTC as "The principal voice of agriculture exporters in US transportation policy." Many member companies rely on the Northwest Seaport Alliance to ship exports such as hay, forest products, frozen and chilled meat, soybeans, and other products to foreign markets. Agriculture exporters are limited in their choice of ports based on geography. The NWSA serves as a critical port for agriculture exports with origins as far as the Midwest.

We are concerned that the process that has been proposed for the cleanup threatens to indefinitely delay the planned deepening of the East Waterway, part of the Seattle Harbor Navigation Improvement Project (SHNIP). We understand that USACE's position is that the deepening project cannot proceed under an interim cleanup. The SHNIP is extremely important to maintain the NWSA's Seattle terminals' competitiveness among other North American ports.

AgTC member companies depend on the NWSA remaining a top-tier, big ship ready gateway. In 2022 over \$14 billion in exports traveled through the NWSA, and overall it ranks #2 for agriculture exports by tonnage and #2 for refrigerated exports among US ports.

If the USACE is unable to deepen the waterway, it will limit NWSA's ability to receive as many calls from larger vessels, and those vessels that do call will load and unload less cargo than they would if the waterway is deepened as planned. A trend in the shipping industry is the rapid growth in the size of container vessels. Today, the NWSA receives regular calls from vessels with capacities of up to 15,000 TEUs (twenty-foot equivalent unit containers), more than twice the capacity of the average sized vessel that called NWSA terminals just ten years ago. Ocean carriers are continuing to emphasize economies of scale and increasingly are only calling at ports that are able to effectively handle these larger ships. Channels that are too shallow are a competitive disadvantage because they often require ocean carriers to delay arrivals or accelerate departures or to carry less cargo to sit higher in the water and achieve the under-keel clearance that is needed to transit safely.

Without sufficient capacity for big ships at the NWSA's Seattle terminals, we will lose opportunities to get our exports onto ships and participate in the global economy. This in turn threatens thousands of family-wage jobs throughout the Northwest and erodes our share of a highly competitive global market for agricultural commodities.

In order to meet the region's cleanup responsibility and unlock the economic opportunity contingent on a deepened East Waterway, **we strongly encourage EPA to adopt a cleanup plan that allows the deepening project to be completed as soon as possible.** Most importantly, the EPA should issue a final record of decision and undertake a final, not interim cleanup action. This will give USACE the confirmation it needs to begin design and construction of the deepening project. Given the long timeline of the proposed cleanup and potential monitoring periods, however, we also encourage EPA to work with USACE to coordinate construction of the deepening and cleanup concurrently and to complete the work as soon as possible.

Thank you for taking the time to consider the economic importance of the East Waterway as you develop the cleanup plan. We are confident the region can find solutions that meet each agency's goals as well as the needs of local communities and Northwest businesses that rely on robust, competitive trade through the region's premier international gateway.

Sincerely,

A handwritten signature in black ink, appearing to read 'Peter Friedmann', with a long horizontal line extending to the right.

Peter Friedmann  
Executive Director  
Agriculture Transportation Coalition – AgTC  
[Info@AgTrans.org](mailto:Info@AgTrans.org)